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9  
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12  
 13 **UNITED STATES DISTRICT COURT**  
 14 **DISTRICT OF NEVADA**

15  
 16 EMPIRE TECHNOLOGICAL GROUP  
 17 LIMITED,

18 Case No. 2:22-cv-00923

19 Plaintiff,

20 vs.  
 21 **COMPLAINT FOR PATENT**  
 22 **INFRINGEMENT**

23 LIGHT & WONDER, INC., and  
 24 SG GAMING, INC.,

25 Defendants.

26 **DEMAND FOR JURY TRIAL**

27 Plaintiff Empire Technological Group Limited (“Empire” or “Plaintiff”) through its  
 28 undersigned counsel, brings this action against Light & Wonder, Inc. (formerly known as  
 1 Scientific Games, Inc.) (“LWI”) and SG Gaming, Inc. (“SGGI”) (collectively “Defendants”).  
 In support of the Complaint, Plaintiff alleges as follows:

29  
 30 **JURISDICTION AND VENUE**

31 1. This is an action for patent infringement pursuant to 35 U.S.C. § 271 *et seq.*  
 32 This Court has exclusive subject matter jurisdiction over this action under 28 U.S.C. §§ 1331  
 33 and 1338(a).

34 2. This Court has personal jurisdiction over Defendants because, on information  
 35 and belief, Defendants’ corporate headquarters are located in this District at 6601 Bermuda  
 36 Road, Las Vegas, NV 89119, and Defendants have done substantial business in this judicial  
 37 district.

38 3. Venue is proper in this Court under 28 U.S.C. §§ 1391(b)(2), 1391(c)(2), and

1 1400(b) based on the foregoing facts and because, on information and belief, a substantial  
2 part of the acts or omissions giving rise to the claim, including Defendants' acts of  
3 infringement, have occurred in this judicial district.

4 **THE PARTIES**

5 4. Empire is a corporation organized and existing under the laws of the State of  
6 Nevada having a principal place of business at 7175 W. Post Rd., Las Vegas, NV 89113.

7 5. On information and belief, LWI (formerly known as Scientific Games, Inc.) is  
8 a Nevada corporation having a principal place of business at 6601 Bermuda Road, Las Vegas,  
9 NV 89119.

10 6. On information and belief, SG Gaming, Inc. is a gaming manufacturer and a  
11 subsidiary of LWI, having a principal place of business at 6601 Bermuda Road, Las Vegas,  
12 NV 89119.

13 **THE ASSERTED PATENT**

14 7. United States Patent No. 11,341,807 ("the '807 Patent"), titled "DISPLAY  
15 ASSEMBLY FOR RELEVANT MESSAGING FOR GAMING APPARATUS AND  
16 METHODS THEREOF," was duly issued by the United States Patent and Trademark Office  
17 ("USPTO") on May 24, 2022. A true and correct copy of the '807 Patent is attached hereto as  
18 Exhibit A.

19 8. Empire owns by assignment the entire right, title, and interest in and to the  
20 '807 Patent. As the owner of the entire right, title, and interest in and to the '807 Patent,  
21 Empire possesses the right to sue and to recover for infringement of the '807 Patent.

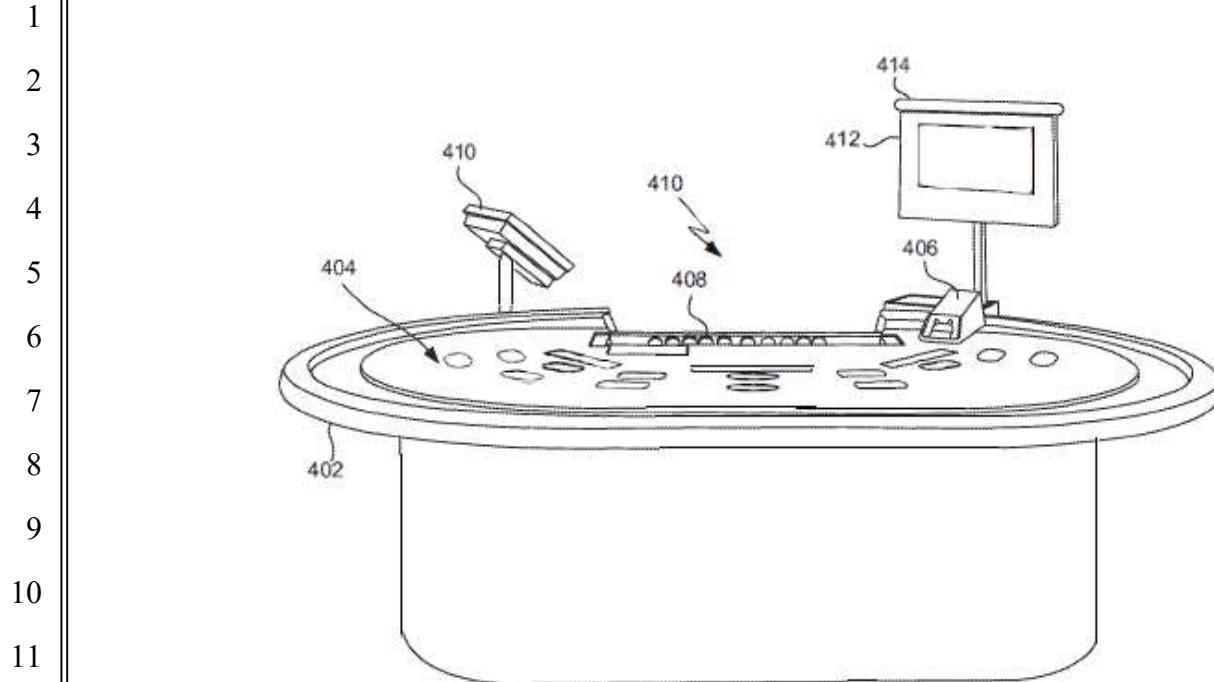
22 9. The '807 Patent is directed to a display assembly and message for an electronic  
23 gaming apparatus.

24 10. Figure 4 of the '807 Patent, which illustrates non-limiting aspects of some of  
25 the claimed embodiments, illustrates a gaming apparatus 400 having an electronic card shoe  
26 406, a chip tray 408, a dealer terminal 410, a table display 412, and an edge display 414.

27 ///

28 ///

LEWIS ROCA

3993 Howard Hughes Parkway, Suite 600  
Las Vegas, NV 89169**FIG. 4**

11. Figure 9A of the '807 Patent, which illustrates non-limiting aspects of some of  
12. the claim embodiments, illustrates a display assembly 900 having a display panel 902, an  
13. inner border region 904, an outer cover structure 906, and a plurality of light segments 908.  
14. Further, as described at column 13, lines 2-8 of the '807 Patent, “[t]he light segment 908 can  
15. include three light segments 908a, 908b, and 908c. The light segment 908b can be provided  
16. within the left side portion of the outer cover structure 906. The light segment 908c can be  
17. provided within the right side portion of the outer cover structure 906.”

21. / / /

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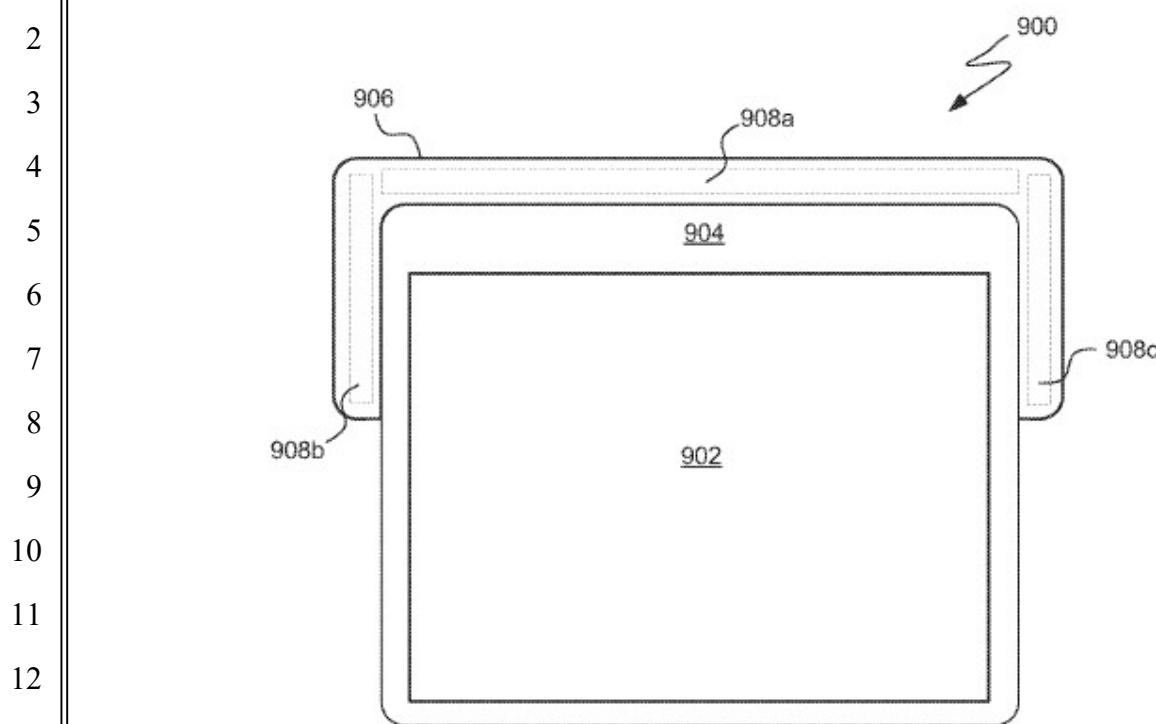
24. / / /

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**FIG. 9A**

12. Empire sells products embodying the invention of the '807 Patent, called Smrt  
13. Choice™ Products. The products include Smrt Trend Board™ and Smrt Trend Wall™. Some  
14. examples of Empire's products are available on its websites:  
15. <https://www.etgltd.com/smrt-trend-board>

16. <https://www.etgltd.com/new-page>

17. 13. The '807 Patent includes 21 claims, of which claims 1 and 11 are independent.  
18. Independent claim 1 of the '807 Patent recites:

19. 1. An electronic gaming system comprising:  
20. an electronic gaming table having a table controller;  
21. a table display device configured to operatively connect to the table controller  
22. and be controlled to present gaming related information pertaining to wager-based  
23. table games at the electronic gaming table; and  
24. an edge display located along at least one edge of the table display device and  
25. being configured to operatively connect to the table controller and be controlled to

present gaming related information, wherein the gaming related information is information pertaining to a wager-based table game at the electronic gaming table and wherein the edge display comprises:

an outer cover structure having a central hollow region; and

a plurality of light segments positioned within at least a portion of the central hollow region, the light segments being adjacent one another.

14. Independent claim 11 of the '807 Patent recites:

11. A display assembly, comprising:

a first display panel;

an inner border region around an outer periphery of the first display panel;

an outer cover structure positioned around at least a portion of an outer periphery of the inner border region, the outer cover structure having a central hollow region; and

a plurality of light segments positioned within at least a portion of the central hollow region, the light segments arranged adjacent one another,

wherein the plurality of light segments are configured to communicate with a controller to be individually controlled to be illuminated

## THE DEFENDANTS AND THEIR ACCUSED PRODUCTS

15. Defendants are currently making, using, offering for sale, and/or selling electronic gaming tables and display panels that infringe the '807 Patent, including at least the products advertised as "i-Table", "I-Score Plus", and "I-Score Ultra" (collectively, the "Accused Products"). On information and belief, the products shown in Exhibit B depict the Accused Products and describe the "i-Table", "I-Score Plus", and "I-Score Ultra."

16. Defendants' electronic gaming tables, including at least the table marketed as "i-Table", each have, either literally or under the doctrine of equivalents, all the elements of at least claim 1 of the '807 Patent as described in the chart attached hereto as Exhibit C and as follows:

(i) The i-Table is described as using “six touchscreens embedded in a standard size table, the i-Table united an intuitive electronic betting interface with a live dealer who deals the selected game from the card reading shoe”;

(ii) The i-Table is available for various electronic gaming options, including, Blackjack, Three card Poker, Ultimate Texas Hold'em, and Mississippi Stud;

(iii) The i-Table includes display panels that Defendants market as the “i-Score Plus” and the “i-Score Ultra”.

1 (iv) The i-Table also includes Defendants' "Safe-Bacc™" product, which  
 2 controls the shuffling of cards, distribution of cards, scoring, and providing updates  
 to the display panels attached to the i-Table;

3 (v) Defendants' display panels include a "low profile LED light bar for game  
 4 outcomes and trend tracking, and picture-in-picture capabilities to stream external  
 content on the main display (progressive meters, sporting events, marketing  
 messages, etc.");

5 (vi) Defendants' display panels as designed to work with controllers, namely,  
 6 Defendants' i-Shoe™ Auto intelligent shoe and the Safe-Bacc™ products;

7 (vii) The i-Score Plus and i-Score Ultra display panels include panels located  
 8 along at least one edge of the i-Score Plus and i-Score Ultra display panels that can  
 be illuminated;

9 (viii) The i-Score Plus video shows that edges of the display panel can  
 10 change colors to represent various scenarios such as player win or banker win; and

11 (ix) The photographs and videos show that the i-Score Plus and i-Score Ultra  
 12 display panels have a hollow region in which light segments are housed next to each  
 other.

13 17. Defendants' display panels, including at least the products marketed as "i-  
 14 Score Plus" and "i-Score Ultra", each have, either literally or under the doctrine of  
 15 equivalents, all the elements of at least claim 11 of the '807 Patent as described in the chart  
 16 attached hereto as Exhibit C and as follows:

17 (i) Defendants' i-Score Plus and i-Score Ultra display panels have an inner  
 18 border region as well as an outer cover structure having a central hollow region;

19 (ii) The display panels also appear to show adjacent light segments in the  
 20 central hollow region controllable by a controller; and

21 (iii) Defendants also describes the display panels as designed to work with  
 22 controllers, namely, Defendants' i-Shoe™ Auto intelligent shoe and the Safe-Bacc™  
 23 products.

24 18. Accordingly, Defendants have infringed, and continue to infringe, at least  
 25 claims 1 and 11 of the '807 Patent by making, using, offering for sale, and/or selling the  
 26 Accused Products, which embody all of the features of at least claims 1 and 11 of the '807  
 27 Patent.

28 **CLAIM FOR RELIEF**

29 (Patent Infringement of U.S. Patent No. 11,341,807)

30 19. Empire incorporate and re-alleges Paragraphs 1 through 18 of this Complaint  
 31 as if full set forth herein.

32 20. The USPTO duly issued the '807 Patent on May 24, 2022.

21. The '807 Patent is valid and enforceable.

22. Defendants have infringed at least claims 1 and 11 of the '807 Patent, either literally or under the doctrine of equivalents, by making, using, offering to sell, and/or selling in the United States its electronic gaming tables and display panels, including at least the products marketed as "i-Table", "I-Score Plus", and "I-Score Ultra" (referred to above and below as the "Accused Products"). Some example of the Accused Products include, but are not limited to, the products on the websites:

<https://www.sggaming.com/Games/Shuffle-Master/Electronic-Tables/i-Table-7787>

<https://www.sggaming.com/Games/Shuffle-Master/Shufflers-and-Utilities/Scoreboards/iScore-Plus-7810>

<https://www.sggaming.com/Games/Shuffle-Master/Shufflers-and-Utilities/Scoreboards/i-Score-Ultra-18327>

*See Exhibit B.*

23. Defendants' infringement of the '807 Patent has injured Empire, and Empire is entitled to recover damages adequate to compensate it for Defendants' infringement, which in no event can be less than a reasonable royalty.

24. Defendants' infringement of the '807 Patent is exceptional. Accordingly, pursuant to 35 U.S.C. § 285, Empire is entitled to recover from Defendants its reasonable attorneys' fees and costs incurred in prosecuting this action.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment as follows:

- A. That Defendants have infringed the '807 Patent;
- B. Entry of a permanent injunction against further infringement of the '807 Patent;
- C. An award of damages adequate to compensate Empire for Defendants' infringement of the '807 Patent, including pre-judgment interest and costs;
- D. An award of all other damages permitted by 35 U.S.C. § 284;

E. A determination that this is an exceptional case within the meaning of 35 U.S.C. § 285 and an award to Empire of its costs and reasonable attorneys' fees incurred in this action; and

F. Such other relief as this Court deems just and proper.

Dated this 8<sup>th</sup> day of June, 2022.

## LEWIS ROCA ROTHGERBER CHRISTIE LLP

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**LEWIS ROCA**

1 **JURY DEMAND**

2 Plaintiff requests a jury trial of all issues in this action so triable.

3 Dated this 8<sup>th</sup> day of June, 2022.

4 LEWIS ROCA ROTHGERBER CHRISTIE LLP

5  
6 By /s/ Meng Zhong \_\_\_\_\_  
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